

ATTACHMENT XIV



Peninsula School District

14015 - 62nd Ave. NW, Gig Harbor, WA 98332
(253) 857-3501 • Fax (253) 857-3576
Support & Operations

DECLARATION UNDER PENALTY OF PERJURY

I, Marcia E. Harris, depose and state as follows:

1. I am Deputy Superintendent of the Peninsula School District #401 licensee of KGHP, FM.
2. I declare under penalty of perjury that the information provided in the Peninsula School District comments with respect to the operations of KGHP is true and correct to the best of my knowledge.



Marcia E. Harris
Deputy Superintendent
Peninsula School District

JULY 21, 2002

Secretary
Office of the Secretary
Federal Communications Commission
445 12th Street SW.
Washington, D.C. 20554

Subject: Notice of Proposed Rule Making (Released June 7, 2002)

Reference: MB Docket 02-136, RM-10458

Gentlemen:

We have reviewed carefully the referenced documents and other sources of information regarding the proposed Revision of Allotments for FM Broadcast Stations, particularly the assignment of a channel to Covington, Washington, to be used by station KMCQ, currently operating in The Dalles, Oregon.

On the basis of our review we hereby Petition The Federal Communications Commission to deny the Proposed Revision for the following basic reasons:

1. That The Town of Covington does not meet "a majority of The Commission's criteria" as "an Independent City", is not in any manner "an Underserved Community", and that no showing has been offered that adding still another radio signal to "The Seattle Metropolitan Mix" of over 60 listed stations is in the public interest. (A List of Stations on-air is included with these documents).

2. That the portion of the Applicant's Proposal for granting a channel to Covington is deficient in the "Loss of Service" presentation in that it totally ignores two community-based, currently- operating facilities of public service, KGHP's Translator K283AH, (Gig Harbor), station KMIH (Mercer Island), and several Applicants who have filed for use of the frequency of 104.5 MHz. under the new "Low Power FM" FCC Program.

3. That we have been advised by our Broadcast Engineering Consultant that it is his understanding that there is a Construction Application now before the Commission (or pending) by station KFNK wherein there may be an unstated and/or unresolved Second Channel Adjacent signal contour overlap problem relative to Channel 285.

4. That Translator K283AH, operated by Peninsula School District station KGHP in Gig Harbor, is operating in the public interest in Public Education, and Public Safety programs, and that Translator K283AH was constructed specifically to provide adequate and reliable coverage of Gig Harbor, it's City of License. We contend that full coverage of Gig Harbor, a fully-qualified and separate city, should not be diminished in any manner.

5. That if there is a problem regarding the provision of required signal over the entire City of Covington that any adjustments should be required to be explained with complete contour calculations based upon recognized and accepted engineering standards, as we find the data presented to this point to be inadequate and incomplete for the purpose of full public disclosure.

6. We feel that full disclosure of the nature of the Proposed Channel Assignment should make clear the full extent of the consequences of any action, specifically as to whether any locations, frequency exchanges, power levels and/or arrangements and/or agreements or future understandings are involved in the case of, but not limited to, meeting full coverage requirements for the City of Covington.

1-A. EXTENT TO WHICH THE RESIDENTS OF COVINGTON WORK IN THE TOWN OF COVINGTON.

We do not find that "the number of Residents of Covington that work in The City of Covington" supports in any manner the contention that Covington is Independent of Seattle. The Applicant does not claim that there is any such evidence. Covington is a pleasant "Bedroom Community",

not unlike a number of other surrounding communities in South King County whose residents are mainly employed in aircraft manufacture, shipping, truck building, transportation, export-import businesses finance, media, and many, many areas that are all centered in The City of Seattle and the area immediately south of that City's central core. There are also military-related jobs; we were able to find none of this activity in Covington, but heavy involvement in/near Seattle and in/near Tacoma.

1-B. Newspapers and Other Media. Again, no claim is made for Covington on the basis of having "it's own newspaper", which it does not. Applicant fails to mention that the newspapers with the largest circulation in the Greater Seattle area are The Seattle Times and The Seattle P-I, both of which are said to maintain South King County Bureaus. South King County is also served by The Morning News Tribune of Tacoma, which also maintains a South King County news operation. Our information indicates that "Washington CEO" maintains a Seattle office, and the contention that Covington has a "Website" is not viewed as germane to this issue-almost any group can have a "Website" without it providing any evidence as to the independence of the group from anything else.

1-C. Community Leaders and Residents Perceive Themselves as Separate from Seattle. While retail business owners and operators and persons employed by Covington may feel a sense of identification with the named city no proof is offered that any given portion of the residents of this bedroom community feel separate from Seattle. Covington residents sit in Seattle/South King County traffic jams, they attend Seattle Seahawk football games in Seattle, they attend Seattle Mariner baseball games in Seattle and they attend Seattle Sonic basketball games in Seattle.

Covington residents do their major shopping in Seattle and Tacoma Malls, they go to Seattle for Amtrack train travel, to Sea-tac for air travel and to Greyhound terminals in either Seattle or Tacoma for bus transportation. Covington residents must go to Seattle or Tacoma, or elsewhere in Western Washington, for higher-level (college) educational opportunities. None of these facts establish Covington as separate from major involvement of residents with Seattle establishments.

1-E. ZIP CODES AND TELEPHONE BOOKS. The Applicant does not claim a "separate" telephone book for Covington, indeed there is not one. Again, Covington is best seen as a bedroom community of South King County, whose residents mainly work, shop and seek recreational activities in the Greater Seattle Metropolitan Area.

Information as to whether Covington has an "exclusive" Postal Zip Code is not clear, but information indicates that Zip Code 98042 may contain areas other than and outside of the Covington City limits.

As a matter of comparison, Gig Harbor, the City of License of station KGHP, (protection of whose translator K283AH is the subject of this Petition) has its' own exclusive telephone book for the Gig Harbor and Key Peninsula areas, and the Gig Harbor Post Office has three Zip Codes (98335, 98329, and 98332) assigned to it. If the full coverage of KGHP/K282AH is to be considered two more Zip Codes (98349 and 98394) would be included in the consideration of the public interest of KGHP.

1-F. Our finding is that Covington is served by South King County bus service, rather than a bus service that is integral to The City of Covington .For this type of public transportation the residents of the city are dependent upon County facilities which are, in turn, largely dependent upon the activity of The Greater Seattle Area market.

1-G. It is our belief that residents and business owners in Covington are largely, if not totally dependent upon the Advertising Market centered in Seattle. We find that the paper serving South King County, including many small towns, is actually published in Kent, while advertising offices of radio stations, television, and major newspapers are clustered in Seattle. Applicant has not provided any figures related to advertising "buys" from the Covington business community.

1-H. It is our belief that Covington contracts with King County for protection services of the Sheriff's office, and that Fire protection comes

from King County Fire District #37. Students from Covington attend Kent School District schools, and our information is that the Covington Library is stocked by the King County Library System. We believe that these factors clearly indicate that Covington is dependent upon the facilities and services of larger urban areas such as the Kent School District and King County.

2 (A). LOSS OF SERVICE. We Petition that the Proposed Revision of Allotments Proposal be denied on the basis that the statements under "Loss of Service" reflect only a portion of the question of loss of service to the public in that it appears that the operation of KMCQ from Covington would seriously impair or completely eliminate the broadcast coverage of Peninsula School District's Translator installation K283AH. Translator K283AH was granted a license by the FCC to cover portions of KGHP's City of License KGHP area that lie behind hills, are within deep contour depressions within and near the City of Gig Harbor and/or are "shaded" by steep cliffs along the edge of the waters of The South Puget Sound.

KGHP has been serving Gig Harbor and the surrounding area since approximately 1988 with programs of music, news, local sports broadcasts, public election candidate forums, concerts, "The Gig Harbor Parade", "The Blessing of The Fishing Fleet" promotion of various club activities which benefit college scholarships, regular presentation of the local Crime Prevention program "Crimestoppers," presentation of great numbers of Public Service Announcements which pertain to our area, and full operation of The National Emergency Alert System ("EAS") as well as Peninsula School District news which includes Weather Cancellation notices (usually snow) and other information for students and parents.

KGHP is also a major participant in the local/Pierce County Emergency Response operation including events related to Traffic Situations with The Tacoma Narrows Bridge, and other events such as earthquake, flood, fire, public terrorism, etc. For this participation KGHP has installed

emergency power sources for studio, main transmitter, and for Translator K283AH, and works closely in cooperation with The Peninsula Light Company, Century Telephone Company, and with the Emergency Operations Center of Pierce County Fire District 5, which is our connection with Washington State Emergency Response and with FEMA. Letters documenting these operations are presented herewith and made a part of our response asking that the Proposed Action be denied.

KGHP, operating in conjunction with translator K283AH also is a teaching facility, allowing students the opportunity to learn the radio art while being able to be heard and receive public response through the coverage provided in part by translator K283AH. This teaching aspect of public education was recently recognised by the award of a 2-year Federal Grant from the United States Department of Education (along with nine other stations in the United States) for the development of a National Curriculum in Radio Arts. A letter testifying to this educational aspect of the KGHP/K283AH operation is a part of this petition.

LOSS OF SERVICE (2B): Although not mentioned by The Applicant, it would appear that the result of the Revision of Allotments and the operation of station KMCQ as proposed would completely eliminate the service of radio station KMIH to the Mercer Island (Washington) community and educational operations of The Mercer Island School District. We believe that any such result would be completely unacceptable within the meaning of the utilization of the radio spectrum in the public interest as required by the Federal Communications Act of 1934, as amended.

LOSS OF SERVICE (2C): Although not mentioned by the Applicant there are a number of new Applications for new Low Power FM radio stations, either Pending or Accepted for Filing that would be affected by the Proposed Action. These are applications from the communities of Federal Way (13338), Bainbridge Island (13391), Auburn (13395), Maple Valley (13427), Fall City (13427), Federal Way (13458), Enumclaw (13464), Sumner (13472), Carnation (13541) and Auburn (13565). With the understanding that the Low Power FM station license allocation program

was instituted and placed in operation so that small community groups could be served by stations with a power of 100 watts or less the elimination of such an opportunity for those already applying for licenses in the locations named seems inconsistent with the serving of the public interest in this FCC-originated program.

LOSS OF SERVICE (2D): Relative to the "Provision of Service" as proposed to Moro, Oregon, and to Trout Lake, Washington, we are unable to understand how any provision as outlined for these two communities will make up for whatever "truly local" radio service is being provided from Applicant now much closer at The Dalles, Oregon. Since the listed population of Covington (13,000) is only approximately one and one-half per cent of the roughly 800,000 persons said to be potentially "served", and Moro and Trout Lake comprise only a tiny fraction of these numbers. it seems probable that the proposed signals reaching the new channels at The Dalles and the two smaller communities will be overwhelmingly oriented to the commercials and activities of The Greater Seattle Area. Should that be the case, we contend that such action would not make up for the "Loss of Service" in these previously served areas.

SUMMARY:

We believe that the facts as set forth in these pages, as further amplified by the long list of officials and other persons, both public and private, fully confirm that:

(a) Any Amendment to the FM Table of Allotments to provide station KMCQ with Channel 283 in Covington, Washington, would be contrary to the Federal Communications Commission's own Guidelines and Rules, as Covington does not demonstrate the aspects of "a Separate Community".

(b) Any action that would allow the establishment of station KMCQ with the indicated power and antenna position, using Covington as a City of License, would be highly unfair and would cause great and unnecessary harm to current stations and prospective applicants of LPFM. The current

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license holders have been shown to be established, valuable, and respected operations, operating within the true meaning of "Serving the Public Interest" as set forth in 47 USC Section 307 of The Communications Act of 1934, as amended.

We therefore respectfully Request that The Petition to Amend The FM Table of Allotments be Denied.

Very truly Yours,

A handwritten signature in black ink, appearing to read "Keith L. Stiles".

Keith L. Stiles
Chief Engineer, KGHP
Post Office Box 510
Vaughn, Washington 98394
(253)-884-3379
FAX (253) 857-8541

LIST OF COMMUNICATIONS IN SUPPORT OF THIS REQUEST TO DENY

Communication sent from:

1. The Peninsula School District (Owner and Operator of KGHP/K283AH)
2. Mayor, City of Gig Harbor, Washington (KGHP City of License)
3. The Honorable Norm Dicks, U.S. Congressman, 6th Washington District
4. The Peninsula Light Company
5. Ms. Patrica Lantz, Washington State Representative, 26th District
6. Mr. Brock Jackley, Washington State Representative, 26th District
7. Mr. Bob Oke, Washington State Senator, 26th District
8. Mr. John Ladenberg, Pierce County Executive
9. Ms. Karen Biskey, Pierce County Council, 7th District
10. Paul A, Pastor, Jr., Sheriff of Pierce County
11. Mr. Fred Ramsdell, President, Pierce County Fire District 16 Directors
12. Mr. Bob Black, Chief, Pierce County Fire Dist 5
13. The Peninsula Emergency Preparedness Committee (with attachment)
14. Mr. Terry Lee, Pierce County Planning Commission
15. Ms. Dee Adams, School District Vocational Education Director
16. Mr. Hugh McMillan, Director, "Citizens Against Crime"
17. Mr. Max Bice, local Citizen and veteran Radio Engineer
18. Director, Peninsula School District "Communities in Schools"
19. Ms. Renee Crist, president, Crist Enterprises, Inc.
20. Kenneth and Gloria Metal, "Concerned Citizens of Gig Harbor"
21. Ms. Betty Ringlee, President, Peninsula School Board



Peninsula School District

14015 - 62nd Ave. NW, Gig Harbor, WA 98332
(253) 857-3501 • Fax (253) 857-3575
Support & Operations

July 16, 2002

Secretary
Federal Communications Commission
Washington, D.C.

Subject: KMCQ Proposed Move to Covington, Washington, on 104.5 MHz.

Gentlemen:

On behalf of Peninsula School District Number 401 of Gig Harbor, Washington, we hereby request that you deny the proposed move of station KMCQ of The Dalles, Oregon, to Covington, Washington, for the purpose of operation of a 20 KW transmitter on the FM frequency of 104.5 MHz. Our School District owns and operates radio station KGHP in the public interest in the Gig Harbor area, and much of our most effective transmission comes from the use of our translator (K283AH) on that frequency, 104.5 MHz. The use and location of that translator is vital to us because of various terrain features which make reception from our relatively low power main transmitter difficult and our options for any alternative arrangement are almost non-existent.

We have operated KGHP in the public interest in our area for approximately 14 years and only recently have successfully concluded participation with U.S. Department of Education as one of 10 Educational Stations selected to create a National Teaching Curriculum in the field of Radio Arts.

Together with this letter we are sending to you testimony and comments from local civic leaders, organizations and business groups, speaking to the service that KGHP renders to our local community and asking that you deny any action which would impede our community-based programs through any competing radio signals into our community on 104.5 MHz. KGHP serves a general population in the station's "reach" estimated to be in excess of 65000. KGHP provides specific news and information relative to the area of our School District (Approximately 110 square miles), School District events, Emergency Notifications and various cultural events and public meetings. We feel that such local coverage has always been a major part of the FCC's administrative intent.

We appreciate your consideration of our community needs for local radio broadcast service.

Sincerely,

A handwritten signature in black ink, appearing to read "Marcia E. Harris".

Marcia E. Harris
Deputy Superintendent



City of Gig Harbor. The "Maritime City"

3105 JUDSON STREET
GIG HARBOR, WASHINGTON 98335
(253) 851-8136

July 18, 2002

Federal Communications Commission
Office of the Secretary
445 Twelfth Street SW
Room TW-A325
Washington, D.C. 20554

Re: Request to Deny Move of KMCQ to Covington, WA
FCC MB Docket No. 02-136, RM-10458

Gentlemen:

On behalf of both established local radio service and emergency public safety services provided by the Peninsula School District radio station KGHP to the City of Gig Harbor (KGHP's City of License), we ask the Federal Communications Commission to DENY the move of radio station KMCQ from The Dalles, Oregon to Covington, Washington. The proposed Covington service will conflict with KGHP's FM frequency of 104.5 MHz.

KGHP, particularly through the effective use of its translator K283AH, is an essential part of the local public safety program that we continue to improve to deal with multiple forms of possible harm to our residents, especially since the events of 9-11.

The Gig Harbor and Key Peninsulas, part of the greater Kitsap Peninsula, are potentially isolated in emergency situations by virtue of the Narrows Bridge, our lone immediate access to the Seattle/Tacoma area. Highway 16, the lone military corridor connecting McChord, Fort Lewis and Camp Murray to the Bremerton Naval Shipyard, Bangor Depot and Trident Nuclear Submarine Base runs through our jurisdiction. Even now, we see regular, heavily armed marine patrols in our local bay in light of the terrorist threat. Our area is potentially subject to catastrophic bridge failures, volcanic events, lahars (Mt. Rainier), major Pacific subduction zone seismic events (Richter Scale 7-9), and climatic disasters.

To cope with our geographic separation and with these real threats, we maintain a system that links personal neighborhood organizations; local police, fire and public works agencies; and Pierce County Emergency Management to the broader resources of Washington state and the federal emergency resource system. Radio Station KGHP is a primary component of our local emergency communications scheme.

In all of these operations of broadcasting information for public information and safety, KGHP's translator K283AH operating on 104.5 plays a most vital part, reaching areas where other signals from KGHP on 89.9 do not penetrate.

Federal Communications Commission
July 18, 2002
Page Two

Now, more than ever, our area emergency management network should remain intact. The City of Gig Harbor requests the Federal Communications Commission, for the safety of our citizens, to DENY any action which would impede, lessen, or remove the signal coverage of Translator K283AH.

Sincerely,

A handwritten signature in cursive script, reading "Gretchen A. Wilbert".

Gretchen A. Wilbert
Mayor, City of Gig Harbor

GAW/jp

cc: Representative Norm Dicks
Senator Maria Cantwell
Dr. Mark Hoppen, City Administrator, City of Gig Harbor
Ms. Carol Morris, City Attorney, City of Gig Harbor
Mr. Keith Stiles, KGHP
J. Dominic Manahan, Esq., Counsel for Mid-Columbia Broadcasting, Inc.
Mark N. Lipp, Esq., Counsel for First Broadcasting Company, L.P.

NORM DICKS
6TH DISTRICT, WASHINGTON
COMMITTEE:
APPROPRIATIONS
SUBCOMMITTEES:
INTERIOR
RANKING DEMOCRATIC MEMBER
DEFENSE
MILITARY CONSTRUCTION



Congress of the United States
House of Representatives

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WASHINGTON, DC 20515-4706
PHONE: (202) 225-5216

DISTRICT OFFICES:
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1717 PACIFIC AVENUE
TACOMA, WA 98402-3234
PHONE: (253) 503-6536
SUITE 301
500 PACIFIC AVENUE
BREMERTON, WA 98337
PHONE: (360) 478-4011

<http://www.house.gov/dicks/>

RECYCLED PAPER

July 22, 2002

Secretary Michael Powell
Federal Communications Commission
445 12th Street SW
Washington, DC 20554

RE: FM Frequency 104.5 MHz Rule Making Action

Dear Secretary Powell:

It is my understanding that the FCC is considering a Rule-Making Action that would allow Radio Station KMCQ of The Dalles, Oregon, to move to Covington, Washington, and operate from Covington on the FM frequency of 104.5 MHz.

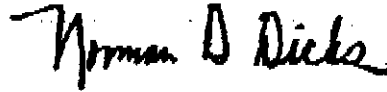
I am writing to ask that the FCC reconsider this proposed action. Such a ruling would not be in the public interest of my constituents living in the 6th Congressional District. The ruling would have a detrimental impact on radio station KGHP in Gig Harbor, Washington. The location and power of the proposed KMCQ operation from Covington, as we understand the application, would completely destroy the useful signal from K283AH, which has a power level of only 90 watts necessary to serve the Greater Gig Harbor area.

Radio station KGHP, owned and operated by Peninsula School District Number 401, currently has a licensed translator, K283AH, on that 104.5 MHz frequency. The physical location and coverage pattern of that translator is vital to the efficient operation of KGHP and the public interest. More importantly, KGHP is a fully-functioning member of the National "Emergency Alert System" ("EAS") and supports Pierce County Emergency Services (including FEMA operations) in cooperation with and through the Peninsula Emergency Preparedness Committee.

KGHP is currently the only licensed radio station in the Northern portion of Pierce County with a service area population of over 65,000 residents. It also provides service to contiguous areas of Mason and Kitsap Counties. The Peninsula School District includes approximately 9000 students. KGHP is just now completing a two-year U.S. Department of Education Study Grant to develop a National Curriculum in the Teaching of Radio and Allied Arts. Only nine other radio stations in The United States were chosen to take part in this Study Grant.

My information is that KGHP's translator, K283AH, operating on 104.5 MHz., provides the most complete and reliable coverage for the residents of the Key Peninsula, and it would be my hope that nothing be done that would interrupt KGHP's service.

Sincerely,

A handwritten signature in black ink that reads "Norman D. Dicks". The signature is written in a cursive style with a large, stylized "N" and "D".

Norman D. Dicks
Member of Congress

NDD:BMC



Peninsula Light Company

A Mutual Corporation

P.O. BOX 78, GIG HARBOR, WA 98335-0078

13315 GOODNOUGH DR. N.W.

PHONE (253) 857-5950

FAX (253) 857-1558

www.penlight.org

July 19, 2002

Secretary
Federal Communications Commission
Washington, D.C.

Subject: Petition to DENY Move of KMCQ to Covington, Washington due to
Resultant Interference with Peninsula School District No. 401
Translator K283AH (Operating on 104.5 MHz)

Reference: FCC MB Docket No. 02-136 and RM 10458 (Released 6/7/02)

Gentlemen:

We have read and considered the referenced Documents and hereby petition to DENY the proposed Move and Operation of Radio Station KMCQ to Covington, Washington, on the basis that the proposed location and power of the installation will severely impact and/or destroy the broadcast usefulness of Peninsula School District No. 401 translator installation K283AH.

Our company, Peninsula Light, is a non-profit, member-owned electric utility cooperative whose franchise for the delivery of electrical power covers the Gig Harbor and Key Peninsulas of the State of Washington. These areas are the same as those of The Peninsula School District, owners and operators of the Radio Station KGHP (with Translator K283AH). The areas are also the sum of the boundaries of Pierce County Fire Districts 5 and 16, responsible for fire protection, emergency medical services, advanced life support and disaster response.

Our area is very susceptible to the frequent high winds that are characteristic of Western Washington coastal communities. As communications systems are almost always compromised during storms, our Company invested more than \$50,000 in hardware, back-up power supplies and modern station equipment to assist KGHP's ability to broadcast power outages and other winter calamities. The station is now unaffected by power interruptions.

Our area serves more than 55,000 people who have become increasingly dependent on the emergency broadcast capabilities of KGHP for emergencies. Not only would the investment of the School District and our company become stranded if the station were forced off the air, the community would lose its only access to the only radio station in Northern Pierce County. KGHP's translator K283AH is a required and necessary part of the coverage that is of vital importance to our community.

We thereby petition The Federal Communications Commission to DENY the proposed move of KMCQ and ask that nothing be allowed that would, in any manner, interfere with the broadcast operations of KGHP and it's translator, K283AH on 104.5 MHz.

Very truly yours,

A handwritten signature in black ink, appearing to read 'REO', with a stylized flourish extending from the end.

Robert E. Orton
Chief Executive Officer

STATE REPRESENTATIVE
26th DISTRICT
PATRICIA T. LANTZ

JUDICIARY
CO-CHAIR
CAPITAL BUDGET
HIGHER EDUCATION

State of
Washington
House of
Representatives



STATE REPRESENTATIVE
26th DISTRICT
BROCK JACKLEY

NATURAL RESOURCES
TRADE &
ECONOMIC DEVELOPMENT
TRANSPORTATION

July 22, 2002

John A. Karousos
Assistant Chief, Audio Division
Office of Broadcast License Policy
Federal Communications Commission
445 12th St. SW
Washington, D.C. 20554

Dear Mr. Karousos:

I have been contacted by one of my constituents regarding the pending Notice of Proposed Rule Making, MB Docket No 02-136 RM-10458.

Mid-Columbia Broadcasting Inc, a licensee of Station KMCQ has filed with your office seeking to amend the FM Table of Allotments by moving from the Dalles, Oregon to Covington, Washington and have asked for frequency 104.5 This proposed change would greatly impact the district I represent.

Currently radio station KGHP is owned and operated by The Peninsula School District Number 401 and holds a license on translator K283AH on frequency 104.5 MHz. The School's station is a recognized educational program and is just now completing a two-year U.S. Department of Education Study Grant to develop a national curriculum in the teaching of radio and allied arts. There were only nine other radio stations in the United States chosen to receive this grant. Washington's business has been telling us for sometime about the lack of technically trained applicants applying for highly skilled positions. Seattle is home to a number of communication and broadcast organizations desperately in need of workers. Students who learn the skills and become inspired to pursue advanced degrees will be the ones touched and encouraged by Peninsula School District's broadcast curriculum. If this change is permitted it will effectively end the School District's ability to provide this program.

KGHP is currently the ONLY licensed radio station in the Northern portion of Pierce County with a service area population of over 65,000 residents. It also provides service to contiguous areas of Mason and Kitsap Counties.

LEGISLATIVE OFFICE: PATRICIA LANTZ / 308 JOHN L. O'BRIEN BUILDING, PO BOX 40600, OLYMPIA, WA 98504-0600 • 360-786-7864
LEGISLATIVE OFFICE: BROCK JACKLEY / 340 JOHN L. O'BRIEN BUILDING, PO BOX 40600, OLYMPIA, WA 98504-0600 • 360-786-7802
TOLL-FREE LEGISLATIVE HOTLINE: 1-800-662-6000 • TDD: 1-800-635-9993

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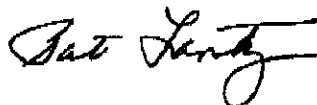


In addition KGHP is a fully-functioning member of the National "Emergency Alert System" ("EAS") and supports Pierce County Emergency Services (including FEMA operations) in cooperation with and through The Peninsula Emergency Preparedness Committee. KGHP's service area is bisected by Washington State Highway 16, which connects Tacoma and Bremerton, Fort Lewis Army Base, McChord Air Force Base, Camp Murray, Madagan Army Hospital, the U.S. Naval Shipyard, and the nuclear submarine base at Bangor.

I would encourage you to look closely at the claim made the Joint Parties in section four that Covington Washington is sufficiently independent to the central city (Seattle) to justify a first local servers preference. Covington is a suburb of Seattle and has access to a host of broadcast media. By revoking KGHP ability to broadcast you would be eliminating service to the Kitsap Peninsula which is independent of Seattle and includes many communities who would lose local service.

I would like to be kept informed about this situation and hope that you will deny the petitioners request.

Sincerely,

A handwritten signature in cursive script, appearing to read "Pat Lantz".

Pat Lantz
Representative

PL:fh

STATE REPRESENTATIVE
14th DISTRICT
PATRICIA T. LANTZ

JUDICIARY
CO-CHAIR
CAPITAL BUDGET
HIGHER EDUCATION

State of
Washington
House of
Representatives



STATE REPRESENTATIVE
26th DISTRICT
BROCK JACKLEY

NATURAL RESOURCES
TRADE &
ECONOMIC DEVELOPMENT
TRANSPORTATION

July 23, 2002

John A. Karousos
Assistant Chief, Audio Division
Office of Broadcast License Policy
Federal Communications Commission
445 12th St. SW
Washington, D.C. 20554

Dear Mr. Karousos:

I would like to add my voice to the objections of Mid-Columbia Broadcast Inc, a licensee of Station KMCQ, being able to broadcast over frequency 104.5 in Kitsap County. Currently radio station KGHP, which is owned and operated by The Peninsula School District Number 401, holds a license on translator K283AH on frequency 104.5 MHz. By granting the petitioners request the FCC would effectively terminate the ability of the School run radio station to operate.

KGHP is a nationally recognized educational program which is a wonderful training ground for students having just completed a two-year U.S. Department of Education Study Grant to develop a national curriculum in the teaching of radio and allied arts.

KGHP is also part of National "Emergency Alert System" and supports Pierce County Emergency Services. In addition KGHP is currently the ONLY licensed radio station in the Northern portion of Pierce County with a service area population of over 65,000 residents. It also provides service to contiguous areas of Mason and Kitsap Counties.

LEGISLATIVE OFFICE: PATRICIA LANTZ / 308 JOHN L. O'BRIEN BUILDING, PO BOX 40600, OLYMPIA, WA 98504-0600 • 360-786-7064
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TOLL-FREE LEGISLATIVE HOTLINE: 1-800-562-8000 • TDD: 1-800-635-9993

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I would like to be kept informed of this situation. This proposed change would have a tremendous impact on the constituency I represent.

Sincerely,

A handwritten signature in black ink, appearing to read "Brock Jackley". The signature is fluid and cursive, with a large loop at the end of the last name.

Brock Jackley
Representative

BJ:fh



Washington State Senate

110 Ivy Newhouse Building
PO Box 40482
Olympia, WA 98504-0482

Senator Bob Oke
26th Legislative District

Phone: (360) 786-7650
Toll-free Hotline: 1-800-562-6000

July 23, 2002

Michael K. Powell, Chairman
Federal Communications Council
445 12th Street SW
Washington, DC 20554

Dear Chairman Powell:

As State Senator of Washington Legislative District 26, I wish to express my concern over the proposed move and operation of Radio Station KMCQ from The Dalles, Oregon to Covington, Washington, and its operation on FM frequency 104.5 MHz with a power of 20 KW or more.

In the 26th District, such operation would provide major interference or perhaps eliminate the coverage of The Peninsula School District's Translator K283AH on FM frequency 104.5 MHz which provides radio service to The Greater Gig Harbor Area, The Key Peninsula and nearby locations along Washington Highway 16 from Tacoma to Bremerton. I wish to point out that KGHP with its translator K283AH is the only radio station serving public needs in that part of Pierce County West of the Tacoma Narrows Bridge.

I am also concerned in a larger sense that allowing such a move on the part of KMCQ would probably totally eliminate Mercer Island School District's radio service from radio station KMIH.

KGHP, with its associate translator K283AH serves as an important "cog" in the State's emergency services operations by working hand-in-hand with FEMA, the Federal Emergency Management Agency, based at Fort Lewis, Washington, as well as providing general broadcast services for more than 60,000 residents in its listening area.

I urge that nothing be adopted by the FCC that would interfere with the operational coverage of KGHP translator K283AH, operating on 104.5 MHz. Thank you for your consideration.

Sincerely,

A handwritten signature in black ink that reads "Bob".

Bob Oke
Washington State Senator
26th Legislative District

cc: Kathleen Abernathy, Commissioner
Michael Copps, Commissioner
Kevin Martin, Commissioner

**Pierce County****Office of the County Executive**

930 Tacoma Avenue South, Room 737
Tacoma, Washington 98402-2100
(253) 798-7477 • FAX (253) 798-6628

JOHN W. LADENBURG

Executive
jladenb@co.pierce.wa.us

LYLE QUASIM

Chief of Staff
lquasim@co.pierce.wa.us

July 22, 2002

Michael K. Powell, Chairman
Federal Communications Commission
445 12th Street SW
Washington, DC 20554

Subject: Anticipated Interference with Peninsula School District's Radio
KGHP Translator K283AH
Re: FCC MB Docket No. 02-136 and RM-10458 of June 7, 2002

Dear Chairman Powell & Fellow Commissioners:

The proposed move of station KMCQ from The Dalles, Oregon, to Covington, Washington, on 104.5 MHz would, if allowed, cause major interference with translator K283AH, also on 104.5 MHz, an operation of station KGHP-FM, Gig Harbor, Washington.

Radio Station KGHP, owned and operated by the Peninsula School District, is the only radio station in west Pierce County. Working with the Peninsula Emergency Preparedness Committee, KGHP provides emergency information to the public from local authorities and from our Emergency Operations Center, which is located in the Gig Harbor Fire Department. It is linked to Pierce County Emergency Management and from there to FEMA and Federal agencies at Fort Lewis, McChord Air Force Base, and US Navy facilities on Puget Sound. KGHP is an operating member of the National Emergency Alert System (EAS).

Much of the effective broadcast coverage of KGHP is provided through operation of Translator station K283AH, which operates on 104.5 MHz.

We ask that no action be allowed which would reduce or diminish the effectiveness of translator station K283AH, 104.5 MHz.

Sincerely,


John W. Ladenburg
Pierce County Executive



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**Pierce County**

Office of the County Council

930 Tacoma Avenue So., Room 1046
Tacoma, WA 98402-2175
(253) 798-6854
FAX (253) 798-7509
1-800-992-2456

KAREN S. BISKEY
Council Member, District No. 7

July 23, 2002

Secretary
Federal Communications Commission
Washington, D.C. 20554

**Subject: Proposed Move of Radio Station KMCQ to Covington, Washington,
and Anticipated Interference with Translator K283AH, an Operation
of Peninsula School District Radio Station KGHP, Gig Harbor, Washington**

Reference: FCC MB Docket No. 02-136 and RM-10458 (Released June 7, 2002)

Gentlemen:

As Pierce County Council Representative, I wish to express my concern over the proposed move and operation of Radio Station KMCQ from The Dalles, Oregon, to Covington, Washington, and its operation on FM frequency 104.5 MHz with a power of 20 KW or more.

In Pierce County, such operation would provide major interference or perhaps eliminate the coverage of The Peninsula School District's Translator K283AH on FM frequency 104.5 MHz which provides radio service to The Greater Gig Harbor Area, The Key Peninsula, and nearby locations along Washington Highway 16 from Tacoma to Bremerton. I wish to point out that KGHP, with its translator K283AH, is the only radio station serving public needs in that part of Pierce County, west of the Tacoma Narrows Bridge.

I am also concerned in a larger sense that allowing such a move on the part of KMCQ would probably totally eliminate Mercer Island School District's radio service from radio station KMIH.

KGHP, with its associate translator K283AH, serves as an important "cog" in the State's emergency services operations by working hand-in-hand with FEMA, the Federal Emergency Management Agency, based at Fort Lewis, Washington, as well as providing general broadcast services for more than 60,000 residents in its listening area.

I urge that nothing be adopted by the FCC that would interfere with the operational coverage of KGHP translator K283AH, operating on 104.5 MHz.

Sincerely,

A handwritten signature in cursive script that reads "Karen S. Biskey".

KAREN S. BISKEY
Council Member, 7th District
Pierce County Council



**Pierce County****Sheriff's Department**930 Tacoma Avenue South
Tacoma, Washington 98402

July 22, 2002

Federal Communications Commission
Washington, D.C.**Subject:** Petition to DENY Move of KMCQ to Covington, Washington due to
Resultant Interference with Peninsula School District Translator K283AH**Reference:** FCC MB Docket No. 02-136 & RM-10458 (Released 06/07/02)

Ladies & Gentlemen:

It is our understanding that Radio Station KMCQ has requested FCC approval to move from The Dalles, Oregon, to Covington, Washington, and operate from a location and at a power level that would interfere with the transmission of public service from KGHP FM, Gig Harbor, Washington, through their translator K283AH on 104.5 MHz.

Using the excellent coverage of translator K283AH, radio station KGHP is the only public radio station in the western portion of Pierce County and not only provides community broadcasting but also emergency operations and regular broadcasts of our Community Crime Awareness program "Crimestoppers".

We respectfully ask your careful consideration of our community needs and hereby petition you that no approval shall be given to any measure which would half, limit, or diminish the broadcasts of KGHP utilizing Translator K283AH on 104.5 MHz.

Sincerely,

A handwritten signature in black ink, reading "Paul A. Pastor, Jr." in a cursive style.

Paul A. Pastor, Jr.
Sheriff of Pierce County

cj



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PIERCE COUNTY FIRE PROTECTION DISTRICT 16

Fire Protection • Rescue/Medical/Ambulance Services • Public Education • Fire Prevention



July 24, 2002

Secretary
Federal Communications Commission
Washington, D.C.

Subject: Proposed Move of KMCQ to Covington, Washington from The Dalles, Oregon, Creating Interference with Translator Station K283AH, an operation of The Peninsula School District's Station KGHP (FM)

Reference: FCC MB Docket No. 02-136 and RM-10458 of June 7, 2002

Gentlemen:

I have been informed that The FCC has before it the consideration of the referenced Rule Making, the approval of which would reportedly create a problem of interference with the operation of The Peninsula School District's Translator Station K283AH, which is operated from FM station KGHP.

Station KGHP has been serving our area for more than 13 years, and its translator, K283AH provides important coverage of the Greater Gig Harbor-Key Peninsula area, which comprises approximately 107 square miles. Our Pierce County Fire District 16 comprises about one-half of that area, the other half served by Pierce County Fire District 5.

These two Fire Districts are basically responsible for Public Safety in this 107 square mile area, and both are very active members of The Peninsula Preparedness Committee, which was set up to cooperate with both Pierce County and the Federal Government in matters of Disaster. KGHP is also a member of that Committee.

Our only radio station serving this area North of the Tacoma Narrows Bridge is KGHP, which provides the only LOCAL communication with the area public from District Headquarters and from our Emergency Operations Center. Translator K283AH provides an important portion of the broadcast coverage of KGHP and we ask that the FCC take no action, which would in any manner limit its operation on FM frequency 104.5 MHz.

Sincerely,



Fred Ramsdell, Board Chairman

Pierce County



Fire District Five

July 22, 2002

Secretary
Federal Communications Commission
Washington, D.C.

Subject: Anticipated Interference with Peninsula School District's Radio
KGHP Translator K283AH

Reference: FCC MB Docket No. 02-136 and RM-10458 of June 7, 2002

Gentlemen:

The proposed move of station KMCQ from The Dalles, Oregon, to Covington, Washington, would, if allowed, cause major interference with translator K283AH, an operation of station KGHP-FM of the Peninsula School District No. 401, Gig Harbor, Washington.

Much of the effective broadcast coverage of KGHP is provided through operation of Translator station K283AH which operates on 104.5 MHz.

Gig Harbor Fire Department, Pierce County Fire Protection District 5, serves both The City of Gig Harbor and the unincorporated portions of Pierce County on the Gig Harbor Peninsula. Together with neighboring Key Peninsula Fire Department, Pierce County Fire Protection District 16, we share fire, medical, and major disaster responsibilities for the approximately 114 square miles of Pierce County west of The Tacoma Narrows.

Both Fire Districts address major disaster responsibilities with the aid and cooperation of The Peninsula Emergency Preparedness Committee, of which both are members.

Radio Station KGHP, owned and operated by the School District, is also a member of that Committee and is the only radio station in west Pierce County. Working with the Committee, KGHP provides emergency information to the public from local authorities and from our Emergency Operations Center which is located in our fire district. It is linked to Pierce County Emergency Management and from there to FEMA and Federal agencies at Fort Lewis, McChord Air Force Base, and US Navy facilities on Puget Sound.

KGHP is an operating member of the National Emergency Alert System (EAS).

We ask that no action be allowed which would reduce or diminish the effectiveness of translator station K283AH, 104.5 MHz.

Kind regards,

A handwritten signature in cursive script, appearing to read "R. G. Black".

Robert G. Black,
Chief, Gig Harbor Fire Department

PEP-C

Peninsula Emergency Preparedness Committee

serving the Gig Harbor and Key Peninsulas since 1985
PO Box 1217; Gig Harbor WA 98335-3217
email: prepare@pep-c.org; web site: www.pep-c.org

Secretary
Federal Communications Commission
Washington, D.C.
July 19, 2002

Subject: Proposed Move of Radio Station KMCQ to Covington, Washington and anticipated Interference with Translator K283AH, an operation of Peninsula School District Radio Station KGHP, Gig Harbor, Washington.

Reference: FCC MB Docket No. 02-136 and RM-10458 of June 7, 2002

Gentlemen:

As vice-chair of **The Peninsula Emergency Preparedness Committee ("PEP-C")**, I wish to express our organization's deep concern over any action by the Federal Communications Commission which would limit, endanger, curtail or possibly eliminate Peninsula School District Number 401's translator K283AH on 104.5 MHz. This translator has been in operation on that frequency for several years and is an important portion of the public service and emergency operational coverage of our *only* local radio station, KGHP.

PEP-C has been serving the Gig Harbor and Key Peninsulas of Puget Sound since 1985 and has as its mission the education of our community to be prepared to be self-sufficient and help one another in case of emergencies. We enjoy a national reputation as a model community-based preparedness organization. **PEP-C** is an all-volunteer 501(c) 3 corporation. All of our services are free. We work closely with Pierce County Department of Emergency Management, City of Gig Harbor, Pierce County Fire Districts 5 and 16, Peninsula Light Company and Washington State Military Department of Emergency Management. One of our Board of Directors, Marvin Nauman, is employed as a Public Information Officer with FEMA and is currently on assignment. Hence, our ties go to the federal level with support for building a prepared populace and close communication with our community.

Peninsula Emergency Preparedness Committee, Inc.
General Chair - David Watson; 253/857-7048
Nonprofit, tax exempt # WA UBI 601-469-369; IRS #91-163385
Your contribution is tax deductible.

PEP-C

Peninsula Emergency Preparedness Committee

serving the Gig Harbor and Key Peninsulas since 1985

PO Box 1217; Gig Harbor WA 98335-3217

email: prepare@pep-c.org; web site: www.pep-c.org

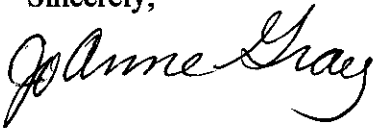
Our work exemplifies the recent FEMA Project Impact Program, aimed at reducing risk before a disaster strikes. One of the key elements of our work involves being able to communicate with the public. State, and Federal operations, Mt. Rainier flood plain concerns, and high earthquake risk in the area make public information essential. Highway 16 and the Tacoma Narrows Bridge is the major road connection in National Defense matters that might involve Ft. Lewis, McChord, The Naval Shipyard, and Bangor. Hazardous materials travel this route daily.

Our peninsulas are isolated from the mainland and have unique and important needs unserved by other Puget Sound communications. The other Puget Sound emergency broadcast station, 710 KIRO, has no connection or communication with our area and cannot serve to advise citizens on emergency matters here.

This is no ordinary school district radio station. KGHP, with translator K283AH is the **only LOCAL** service from Fire District Headquarters (5 and 16) and the Peninsula Emergency Operations Center (with communication from Pierce County Emergency Operations Center). KGHP has invested extensive funds in emergency power, towers, translators and locations. They have gone through the process of qualifying as an emergency broadcast station, broadcasting continuously for 24 hours ongoing and have emergency supplies for on-site staff. They are a key link in the plan developed by Pierce County Emergency Management for all agencies in that every part of the plan depends on communication under non-power situations. Our local HAM group, *Peninsula Amateur Radio Emergency Team*, is also a key part of this County Plan and stands ready to complete links between county and local EOC's and KGHP.

As a matter of public welfare we are asking that the FCC DENY any operation by KMCQ that would in any manner impair, diminish, or eliminate the coverage of The Gig Harbor and Key Peninsula areas of KGHP through the use of translator K283AH on 104.5 MHz.

Sincerely,



JoAnne Gray, vice chair

Peninsula Emergency Preparedness Committee, Inc.

General Chair - David Watson; 253/857-7048

Nonprofit, tax exempt # WA UBI 601-469-369; IRS #91-163385

Your contribution is tax deductible.

Emergencies will happen. We want you to be prepared.

**We live in a high-risk area.
Preparedness is essential.**

The Pacific Northwest has one of the highest risks in the country for volcanic eruption, power outages, floods and, as we were all recently reminded, earthquakes. The best way to keep yourself and your family safe is to prepare for anything.

5 Easy Ways to prepare for any emergency.

Being completely prepared for anything takes planning and resources. But these tips are a good start:

1. Make a family plan including an out-of-area emergency phone contact.
(Detach, fill out, and carry the attached contact information cards. Every family member should carry one and call the contact to check in when long-distance lines are back up.)
2. Secure your home and your things from damage to you and to them.
3. Gather a few supplies, including water and a bed bag or evacuation bag and put them in an easily accessed location. (see web site)
4. Check our website for a monthly activity list. www.pep-c.org
5. Tune KGHP FM 104.5, 89.9, 89.3 for LOCAL information and instructions in any emergency.

Who we are.

We are your Peninsula Emergency Preparedness Committee (PEP-C), an all-volunteer, not-for-profit community group dedicated to helping you, our friends and neighbors of the Gig Harbor and Key Peninsulas stay prepared in the event of an earthquake, volcanic eruption, even simply an extended power outage or storm.

What we do.

We help families and individuals stay prepared through FREE services such as:

- Preparedness workshops
- Regular email updates—check our website
- Helping you organize your neighborhood
- Discount sales of water barrels & supplies

Get your FREE preparedness information kit.

E-mail, write or call us today and we'll send you FREE information on how to keep yourself and your family prepared. (Your privacy guaranteed and No SPAM)

The Peninsula Emergency
Preparedness Committee
P O Box 1217 Gig Harbor WA 98335-3217
Web: www.pep-c.org
E-mail: prepare@pep-c.org
Phone: Dave Watson (253) 857-7048
JoAnne Gray (253) 265-8510

Cut these cards out.

Keep one in your wallet and give the second one to someone you care about.

(Make photocopies to give to your children.)

Out of Area Emergency Contact info:

Primary Contact

Name: _____

Phones: _____

e-mail: _____

(Fold along dotted line)

Additional Info

(Additional contacts, medical info, other local emergency phones)

Out of Area Emergency Contact info:

Primary Contact

Name: _____

Phones: _____

e-mail: _____

(Fold along dotted line)

Additional Info

(Additional contacts, medical info, other local emergency phones)

Preparedness is an act of love. Prepare because you care.

Subject: Request to DENY operation of Radio Station KMCQ on FM Frequency 104.5 MHz from Covington, Washington

July 21, 2002

To Whom It May Concern:

It is my understanding that The Commission is considering a Rule-Making action that would allow Radio Station KMCQ of The Dalles, Oregon, to move to Covington, Washington, and operate from Covington on the FM frequency of 104.5 MHz.

On behalf of my community, and myself, I am writing to request that The Commission DENY THIS PROPOSED ACTION. Such a ruling would NOT be in the public interest. It would be unjust and unfair to our long functioning, established radio station KGHP in Gig Harbor, Washington, a town in this State's 26th Legislative District.

Radio station KGHP, owned and operated by The Peninsula School District Number 401, currently has a licensed translator, K283AH, on that 104.5 MHz frequency. The physical location and coverage pattern of that translator is vital to the efficient operation of KGHP in the public interest.

Of extreme importance is the fact that KGHP is a fully functioning member of the National "Emergency Alert System: (EAS)" and supports Pierce County Emergency Services (including FEMA operations) in cooperation with and through The Peninsula Emergency Preparedness Committee. KGHP's service area is bisected by Washing State Highway 16 which connects Tacoma with Bremerton, Fort Lewis Army Base, McChord Air Force Base, Camp Murray, Madigan Army Hospital, the U.S. Naval Shipyard, and the nuclear submarine base at Bangor.

The location and power of the proposed KMCQ operation from Covington, as we understand the application, would completely destroy the useful signal from K283AH, which has a power level of only 90 watts necessary to serve the greater Gig Harbor area; and for what purpose? It appears this station simply wants to obliterate KGHP for merely selfish, monetary gains without consideration of it's important contribution to our community.

KGHP is currently the ONLY licensed radio station on the northern portion of Pierce County with a service area of over 65,000 residents. It also provides service to contiguous areas of Mason and Kitsap Counties.

The Peninsula School District, which includes approximately 9,000 students, is privileged to partner with KGHP which involved in a two-year U.S. Department of Education Study Grant to develop a National Curriculum in the Teaching of Radio and Allied Arts. Only nine other radio stations in The United States were chosen to take part in this Study Grant. It is a rare opportunity for our Peninsula School District students to participate in a hands-on training program with educational radio.

My information is that KGHP's translator, K283AH, operating on 104.5 MHz., provides the most complete and reliable coverage in many areas for the residents of the 26th Legislative District, and that nothing should be done to interrupt its' service.

I am asking that you will thoughtfully DENY any changes that would make it more difficult for KGHP to meet its' public service obligations.

Respectfully,



Terry M. Lee

Peninsula Advisory Commission, 8 years

Pierce County Planning Commission 11 years, chairman 1990-2001

Pierce County Council, District 7, current candidate